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May 27, 2025

Via ECF

Honorable James M. Wicks
U.S. District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

Re: Superb Motors, Inc., et al. v. Anthony Deo, et al.
Case No. 2:23-cv-6188 (JW)

Dear Judge Wicks:

On behalf of the Deo Defendants, I join Mr. Thomasson's Letter Motion for Contempt of this morning filed at ECF Doc. #288 in every respect.

I would also further and respectfully point out that which we learned from Plaintiffs' counsel at Friday's (5/23/25) emergency court conference. Plaintiffs suspiciously claimed at the conference that they do not have the "\$12,000 needed to transport the vehicles", and that "counsel has not been paid for six (6) months." Plaintiffs knew of this cost on May 9, 2025 but arguably long before that date, and yet brought an emergency application at the 12th hour on Friday. Again, it was Plaintiffs that sought the injunction.

Further, I understand that Plaintiffs filed an appeal of Your Honor's Orders in the Second Circuit and will seek interim relief there. I believe these additional litigation efforts are utterly frivolous and in bad-faith, and of course are inconsistent with Plaintiffs' "plea of poverty" they have made to this Court. With the way Plaintiffs characterize their situation, we should have seen a bankruptcy petition by now, or at least a motion to withdraw as counsel. Plaintiffs plea poverty to the Court and yet Defendants continue to see a barrage of late-night, weakly based litigation efforts causing all sides' additional legal fees.

Thanking the Court for its consideration in this matter.

Very truly yours,

Jeffrey Benjamin
Jeffrey Benjamin, Esq.
